



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

May 5, 2025

By ECF

The Honorable Paul A. Engelmayer
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007-1312

Re: *William Cruz v. United States et al.*, 24 Civ. 817 (PAE)

Dear Judge Engelmayer:

This Office represents the United States and the Federal Bureau of Investigation (collectively, the "Government") in the above-referenced action. Plaintiff William Cruz ("Plaintiff") filed this action asserting claims under the Federal Tort Claims Act, 28 U.S.C. § 1346 *et seq.* The parties write respectfully to jointly request a one-month extension of the Government's deadline to respond to Plaintiff's pre-motion conference letter and a one-month adjournment of the case management conference that is currently scheduled for May 12, 2025.

Plaintiff filed a pre-motion conference letter in this matter and, pursuant to the Court's April 4, 2025, Order, the Government's response to such letter is due on May 8, 2025. *See* Dkt. No. 28. In addition, the Court scheduled a case management conference in this matter for May 12, 2025. *See id.*

The parties respectfully request an extension of the Government's deadline to respond to Plaintiff's pre-motion conference letter, from May 8, 2025, to June 9, 2025, and an adjournment of the case management conference from May 12, 2025, to June 12, 2025 (or at a time convenient for the Court thereafter), because the parties have been engaging in settlement discussions, *see* Dkt. No. 27, and have made progress in their efforts to potentially resolve this matter. The extension of time would permit the parties to continue their settlement discussions which, if successful, would obviate the need for further litigation in this matter.

We thank the Court for its consideration of this request and attention to this matter.

Respectfully,

JAY CLAYTON
United States Attorney


/s/ Adam Gitlin

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cc: All Counsel of Record (via ECF)

GRANTED. The telephonic pre-motion conference is hereby adjourned until Thursday, June 12, 2025 at 9:30 a.m., and the Government's response to plaintiff's pre-motion letter is due June 9, 2025.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

May 5, 2025
New York, New York